

Pamela F. Faggert  
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By Electronic Delivery: attn: [courtney.karp@state.ma.us](mailto:courtney.karp@state.ma.us)  
February 9, 2009

Ms. Courtney Feeley Karp  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: Input from Dominion Resource Services, Inc. Regarding the Emergency  
Regulations of 225 CMR 14.00 Renewable Energy Portfolio Standard - RPS I,  
225 CMR 15.00 Renewable Energy Portfolio Standard – RPS II and 225 CMR  
16.00 Alternative Energy Portfolio Standard – APS

Dear Ms. Feeley Karp:

Dominion Resource Services, Inc. (“Dominion”) is pleased to respond to the Massachusetts Department of Energy Resources’ (“the Department”) request for input regarding the emergency regulations of 225 CMR 14.00 Renewable Energy Portfolio Standard - RPS I, 225 CMR 15.00 Renewable Energy Portfolio Standard – RPS II and 225 CMR 16.00 Alternative Energy Portfolio Standard – APS. As you are aware, in the Commonwealth of Massachusetts, Dominion’s affiliated company is a licensed competitive supplier of electricity and its other affiliated company owns two electric generating stations.

### **Consumer Billing**

As an “electric supplier” in Massachusetts, Dominion Retail’s transactions are performed contractually with transmission and distribution companies for billing services. Dominion Retail’s charges show up under the “Supply Services” portion of a customer’s bill. We request that any renewables charges remain as part of the generation service charge in the “Supply Services” portion of a customer’s bill as is done now, and not under the “Delivery Services” portion of a customer’s bill. This would ensure that utility basic service charges and competitive supplier generation service charges are made up of similar components and allow customers to make an apples to apples comparison when evaluating energy suppliers.

### **APS Carbon Dioxide (CO<sub>2</sub>) Emission Rate**

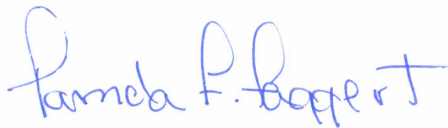
The calculation of the 890 pounds per MWh for CO<sub>2</sub> under the APS was not transparent. We ask that the Department explain how they derived this number, since the statute indicates the net carbon dioxide is not to exceed the average emissions rate of all existing natural gas plants in the Commonwealth, which shall include all emissions related to combustion, gasification, fuel processing and sequestration, whether or not such activities occur at the alternative generating source or at another location. In order to appropriately comment on this emission rate, we need a clearer understanding of how the 890 pounds per MWh for CO<sub>2</sub> was calculated. The 890 pounds per MWh is unachievable by existing units that would consider co-firing alternative fuels.

### **Revision to RPS Emissions Guidance**

We understand that the Department intends to revise the current RPS emissions guideline document developed in conjunction with the Massachusetts Department of Environmental Protection. We request additional details be released to the public regarding the anticipated schedule and process for its development. We also request that the public be allowed to participate and comment on a draft of this document.

Once again, we appreciate the Department's consideration of these issues. If you have any questions, please call Paula Hamel at 401-457-9234 or e-mail at [Paula.a.hamel@dom.com](mailto:Paula.a.hamel@dom.com).

Sincerely,



Pamela F. Faggert

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